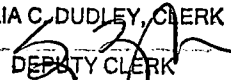


CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

JUN 13 2022

JULIA C. DUDLEY, CLERK  
BY:   
DEPUTY CLERK

722cv00304

1 OF 21

I ARRIVED TO WED  
ONION ON 8/2/11 & IVE  
BEEN AT WED ONION IN  
TOTAL 10 YRS 10 MOS &  
DAYS. I'M AN MENTAL  
HEALTH INMATE & CHRONIC  
PAIN & M H DISORDERS.  
WHILE AT WED ONION IVE  
HAD AN NO. OF ISSUES  
& INCS OF STAFF ABUSE  
& ASSAULTS ON ME &  
IVE A NO OF TIMES  
BEEN DENIED M-H & MED  
CARE & A FAIR CHANCE  
TO PROGRESS THROUGH  
WED ONIONS STEP DOWN  
PROGRAM HAVING RECEI-  
VED AN NO. OF FABRI-  
CATED INFS THAT HAVE  
SET ME BACK & KEPT  
ME FROM ADVANCING.

2 OF 21

MY MH SYMPTOMS THAT  
WERE + STILL ARE UNTRE-  
ATED HAVE GOTTEN ME IN  
TROUBLE + IN SITUATIONS  
WHERE I'VE GOTTEN  
CHARGES + LOST MY  
PRIVILEGES, MONEY,  
PHONE, GOOD TIME, ETC,  
+ HAVE SET ME BACK +  
KEPT ME IN SEG.

MY ASTHMA +  
HSV 1, HERPES VIRUS  
WHILE AT KED OXION  
WENT UNTREATED FOR  
YRS + I DIDN'T GET MEDS  
FOR MY HSV UNTIL 3/28/18.  
I'VE BEEN ASSAULTED  
BY OFCS ON 4 OCCAS-  
IONS ON 2/1/19, 4/5/19,  
9/9/21 + 12/10/21 + ON  
7/17/20 2 2/05 LET  
OK HAD AN INMATE  
ASSAULT + BATTER +  
INJURE ME IN OKW SEG.  
POD 2-5. STAFF NEVER

3 OF 21

ASKED HOW I WAS DOING  
ON IF I WAS OKAY AFTER-  
WARDS & I WAS HARRASSED  
& THREATENED BY STAFF AS  
IF I WAS THE ATTACKER.  
I'M AN BROWN SKIN MALE  
& MY ATTACKER & AN WHITE  
SKINNED MALE. I WAS  
DENIED MH CARE AFTER  
THE ATTACK & ASSAULT.

IN BEEN IN 2 BLDG.  
SEG. SINCE SEPT 2014  
WHERE I'M CURRENTLY  
HOUSED & AM WAITING  
TO SEE IF I'M EVEN  
GOING TO LEAVE 2-4  
POD 1 SM2 & SL6. FABRI-  
CATED CHANGES HAVE  
KEPT ME IN 2-4 AN  
ADDITIONAL 5 MO. &  
COUNTING. I WAS  
ONLY ALLOWED TO GET  
FROM SMO - SM1 - SM2  
BECAUSE AN PRISONER  
GOT INVOLVED & PRISON

4 OF 21

TO THEIR INVOLVEMENT I WAS DENIED SMI DESPITE NOT HAVING ANY CHARGES FOR MY 90 DAY REVIEW PERIOD. THE INES I HAD WITH STAFF, SOME OF THEM, LED ME TO FILE 17 CIVIL SUITS IN USDC & 10 OF THEM PENDING, 2 ARE SET FOR TRIAL & THE OTHERS ARE PENDING RULING ON SUM. JDMT. THEY WERE FILED IN 2020 IVE EVIDENCE THAT AN MEDICINER & I CAUSED ME TO BE INFECTED WITH H PYLOMI & A PRACTITIONER WAITED 7 MO. S TO TELL ME I'D H PYLOMI.

ON 5/3/21, STAFF RECOMMENDED ME FOR OUT OF STATE TRANSFER STATING THAT I'D

5 OF 21

AN HISTORY OF POOR ADJUST-  
MENT & NEEDED AN FRESH  
STANT & NEW ENVIRONMENT  
& THAT I COULD BENEFIT  
FROM THIS & TRANSFER  
WAS APPROVED BY ICA ON  
5/5/21. UNIT MANAGER  
LANNY COLLINS, AST.

WARDEN SHANNON FULLER,  
WARDEN KIRK WHITE &  
INTERSTATE COMPACT  
TRANSFER COORDINATOR  
TOLD ME AT MY CELL  
THAT ID BE TRANSFER-  
RING SOON & MAYBE  
BY MID AUG. 21. IN  
MID AUG 21, I SPOKE  
TO AST. AG LAUKA  
MAUGHN ABOUT THE  
TRANSFER & SHE TOLD  
ME THE TRANSFER  
WAS CONDITIONED ON  
ME DROPPING ALL OF  
MY CASES & ON 1/4/22  
AST AG ANNE MORRIS,

6 OF 21

ANNE WHITE & MEAGON  
OBKLEN STATED THE SAME  
OVER THE PHONE & TOLD ME  
MARYLAND DOC HAD ACCEPTED  
ME. I'VE FAMILY IN  
MARYLAND, DC & HAMPTON  
KDS VA & I MADE VDOC,  
THE WARDEN, AST. WARDEN  
& THE AGS AWARE  
OF THIS. VDOC & KED UNION  
STAFF BULKED ON THE  
TRANSFER BECAUSE I  
DIDN'T DROP MY SUITS &  
DESPITE MY CONTINUED  
ABUSE BY STAFF & 4 INCS  
AFTER MY TALK WITH  
THE AGS THAT HAVE  
LANDED IN YOUR CT. I  
KNOW THAT THE LONGER  
I'M AT KED UNION, THE  
MORE THE INCS OF  
ABUSE WILL OCCUR &  
THE MORE LAWSUITS  
WILL BE FILED IN YOUR  
CT. BY ME. I THOUGHT

7 OF 21

VDOC & STAFFS FOCUS SHOULD BE TO PREVENT LAWSUITS & NOT CREATE THEM. UNFORTUNATELY, LAWSUITS DON'T DETER STAFFS ACTIONS OR BEHAVIOR NOW NOW DOES GRIEVANCES. IN MY GRIEVANCE RESPONSE RE. TO THE TRANSFER, STAFF STATED I HAVEN'T BEEN TRANSFERRED BECAUSE OF MY CIVIL CASES. STAFF WERE AWARE OF MY LITIGATION WELL IN ADVANCE OF MY BEING APPROVED FOR THE TRANSFER. IF THE CIVIL CASES HAD AN EFFECT ON THE TRANSFER, WHY WAS I PUT IN FOR IT & WAS THE TRANSFER JUST A WAY FOR THE AG, VDOC & PRISON STAFF, MY DEFENDANTS TO



8 OF 21

LEVERAGE & BULLY ME  
INTO DROPPING MY SUITS  
THAT I PAID MONEY &  
WORKED HARD TO FILE.  
THEY TRIED TAKING  
ADVANTAGE OF ME. I  
OBTAINED & SUFFERED  
MENTAL, EMOTIONAL,  
PHYSICAL & PSYCHOLOGICAL  
HARM & INJURY FROM  
INCS IN MY CASES.

TRANSPORTATION ISNT  
AN ISSUE & REASON TO  
LEAVE ME IN AN UNSAFE  
ENVIRONMENT & EVERY  
STATE DOC & PRISON HAS  
TRANSPORTATION & CAN  
GET ME TO CT IF NECESS-  
ARY & I CAN STAY IN AN  
LOCAL JAIL & SOME OF  
MY CASES MAY GET  
RESOLVED WITHOUT ME  
HAVING TO APPEAR IN CT.  
CASES TAKE YRS. TO  
GET RESOLVED & IS



9 OF 21

TRANSPORTATION ON ANY  
NON SECURITY REASON,  
PENDING CASES GOOD  
REASON TO LEAVE ME  
IN AN UNSAFE SITUA-  
TION & ENVIRONMENT,  
POTENTIALLY DANGEROUS  
& HARMFUL ENVIRONMENT  
& NOT GIVE ME THE  
FRESH START & NEW  
ENVIRONMENT STAFF &  
VDOC SAID IT FELT I  
NEEDED & WOULD BENEFIT  
FROM. THEIR ACTIONS  
HAVE CONTRADICTED  
THEIR REASONS FOR THE  
TRANSFER. FULLER  
ASKED ME IN APR. 21 IF  
I THOUGHT THE TRANS-  
FER WOULD BE AN ISSUE  
FOR MY LITIGATION & I  
SAID NO. THEN ABOUT  
2 WEEKS AFTER SPEAK-  
ING TO AG MAUGHN  
IN MID AUG WHILE

10 OF 21

DEFENDANT & UNIT MANA-  
GER L. COLLINS & LT. D.

BAKTON WERE PRESENT  
IN COLLINS OFFICE. I ASKED  
FULLER ABOUT THE TRANS-  
FER & HE SAID WHAT  
TRANSFER, YOU GOT ALL  
OF THESE LAWSUITS, YOU'RE  
NOT LEAVING NOW. MONTHS  
LATER, HE & COLLINS TOLD  
ME I WAS LEAVING SOON.

ON 11/5/21 THROUGH  
COUNSELOR K KEGLEY,  
FULLER HAD ME SIGN  
A FORM STATING I WANT  
TO TRANSFER OUT OF  
STATE & I UNDERSTAND  
THIS MAY EFFECT MY  
ABILITY TO LITIGATE MY  
CASES HOWEVER I STILL  
WANT TO TRANSFER. I  
TOOK THIS FORM AS A  
WAIVER OF LIABILITY &  
FULLER SAID THAT IT  
WAS & SAID I'M LEAV-

11 OF 21

ING SOON & AM GOING TO  
A FACILITY I WANTED TO  
GO TO. ON 3/28/22 AT MY  
CELL, WITH COLLINS HE  
SAID TO ME, "I THOUGHT  
YOU WANTED TO GO TO  
MARYLAND", AS IF SOME-  
ONE THOUGHT I DIDN'T  
WANT TO GO TO MARY-  
LAND. I TOLD WHITE,  
FULLER, MOKKIS, WHITE  
& O'BRIEN & WHITE &  
CASE THAT I WANTED  
TO GO TO MARYLAND.  
MY 3/28 TALK WITH  
FULLER CAME ABOUT  
A WK. AFTER TALKING  
TO AGS MOKKIS, WHITE  
& O'BRIEN. WHEN I ASKED  
FULLER ON 3/28 DID  
SOMEONE THINK I DIDN'T  
WANT TO GO TO MARY-  
LAND & HE LOOKED AT  
ME & DIDN'T RESPOND.

THE C/O WHO

12 OF 21

INFECTED ME WITH H  
PYLORI WAS AN DEFEN-  
DANT IN 2V96 + WORDS  
BETWEEN HE + I OVER  
THE CASE CAUSED HIM TO  
INFECT ME WITH H  
PYLORI. THE ASSAULTS  
THAT OCCURRED ON 9/9  
+ 12/10/21 + AFTER SPEAK-  
ING TO THE AG ABOUT  
THE TRANSFER INVOLVED  
DEFENDANTS L. COLLINS  
+ SGT B. TAYLOR, 2V96,  
81, 742, 449, 178, 559 +  
448. I'VE GOTTEN CONT.  
HETALIATION FROM MY  
DEFENDANTS. COLLINS  
WONT INTERVENE WHEN  
OFCS IN HIS BLDG. 12.  
BLDG VIOLATE ME, TAYLOR  
WONT SIGN MY MONEY  
W/DRAWEL FORMS SO  
I CAN SEND MY MAIL  
TO THE USDE. STAFF  
ARE ALLOWING MY CIVIL

13 OF 21

RIGHTS TO BE VIOLATED &  
NO ONE IN WED UNION IS ON  
MY SIDE.

I'M CLAIMING CIVIL  
& CONSTITUTIONAL RIGHTS  
VIOLATION, CONSPIRACY TO  
GET ME TO DROP MY LITIGA-  
TION THROUGH MANIPULA-  
TION & INTIMIDATION & 8TH  
& 1ST AMENDMENT VIOLATIONS.

DEFENDANTS - WED UNION  
WARDEN KICK WHITE,  
AST. WARDEN SHANNON  
FULLER, VDOC DIRECTOR  
HAROLD BLANK, AST AGS  
M. SOBNIEN, A. WHITE,  
A. MORRIS & L. MAUGHN

CLAIMS

WHITE, FULLER & BLANK  
ARE IN VIOLATION OF MY  
8TH AMENDMENT RIGHTS  
BY BEING DELIBERATELY

14 OF 21

INDIFFERENT TO MY SAFETY  
& INJURY I'VE OBTAINED FROM  
THE INCS IN MY 10 CASES  
IN WSDC & THE POTENTIAL  
RISK OF FUTURE HARM  
& RETALIATION & BY PUTTING  
ME AT RISK OF POTENTIAL  
HARM BY LEAVING ME  
IN THE SAME UNSAFE  
ENVIRONMENT AROUND  
THE SAME STAFF WHO'VE  
DEFENDANTS IN MY CASES  
WITH THE NO. OF SUITS  
I'VE FILED & NO. OF DEFEN-  
DANTS, YOU MUST ASSUME  
RETALIATION WILL COME.

FULLER, WHITE,  
OBRIEN, MORRIS, A  
WHITE HAVE CONSPIRED  
TO GET ME TO DROP MY  
LITIGATION THROUGH  
INTIMIDATION & FULLER  
& WHITE/K., THROUGH  
MANIPULATION &  
FULLER, A. WHITE,

15 OF 21

A. MOWNIS, M. OBNIEN,  
L. MAUGHN & K. WHITE  
HAVE DELAYED MY TRANS-  
FER IN RETALIATION OF  
ME DENYING THEIR  
REQUEST TO DROP MY  
LITIGATION VIOLATING  
MY 1ST AMENDMENT  
RIGHTS & DUE PROCESS RIGHTS

MAUGHN, A. WHITE,  
A. MOWNIS, FULLER &  
OBNIEN TOLD ME THAT  
THE CT. DOESN'T LIKE FOR  
LITIGANTS TO BE TRANS-  
FERRED DURING LITAGA-  
TION. IS THAT AT THE  
EXPENSE OF THE LITIGANTS  
SAFETY? I'M SURE THE  
STAGS OFFER & VDOE  
WOULD PREFER AN  
SIMPLE TRANSFER,  
THAT WOULDN'T INCONV-  
ENIENCE ANYONE &  
WOULD RESOLVE THE  
PROBLEM BETWEEN I &



16 OF 21

STAFF THAN TO HAVE MORE  
LAWSUITS FILED, MAYBE  
SEVERAL MORE. I'M NOT  
SAFE AT KEDONION & NO  
DOC, PRISON & STAFF HAS  
A RIGHT TO ABUSE AN  
INMATE, MENTALLY, PHYSI-  
CALLY, EMOTIONALLY &  
PSYCHOLOGICALLY CONTINU-  
OUSLY & INDEFINANTLY<sup>(#)</sup> &  
NOT PROVIDE RELIEF & THE  
CT. IS BOUND TO REMOVE  
(INMATE)  
AN IN DANGER. HOW  
MANY SUITS NEED  
TO BE FILED FOR THE  
CT. TO SAY THERE'S A  
PROBLEM. MONETARY  
DAMAGES WON'T FIX  
THINGS.

I'M SUEING EACH  
DEFENDANT IN THEIR  
INDIVIDUAL & OFFICIAL  
CAPACITIES & I SEEK  
COST, PUNATIVE &

17 OF 21

COMPENSATORY DAMAGES  
& INJUNCTIVE RELIEF IN  
THE FORM OF IMMEDIATE  
TRANSFER FROM KED UNION,  
IF NOT OUT OF STATE  
THEN TO A FACILITY IN  
STATE TO SUSSEX ON  
FACILITY NOT WALLENS  
KIDGE. MY DEPRESSION,  
ANXIETY & DEPRESSION  
INCREASED WAITING  
OVER ANYK FOR A  
TRANSFER THAT SEEMS  
WONT OCCUR SOON & MY  
HOPE DECREASED. IT DOES  
NT HELP THAT FULLER  
& BLANK ARE DEFENDANTS  
IN MY CASES & A WHITE,  
OBRIEN & MORRIS ARE  
REPRESENTING THEM &  
OTHER DEFENDANTS IN  
10 CASES. KED UNION  
STAFF HAVE NOT BEEN  
SENDING MY EMAILS  
OUT, LOCKING MY

18 OF 21

TABLET & NOT ALLOWING  
ME TO SYNC MY PLAYER  
& USE THE MUSIC TO UNLOCK  
IT IN RETALIATION FOR  
ME SENDING & TRYING TO  
SEND EMAILS TO A PRISO-  
NER GROUP RE. TO STAFF  
ABUSING ME & ME SEEKING  
HELP & STAFF HAVE BEEN  
TAMPERING WITH MY  
LEGAL & PERSONAL MAIL  
& REJECTING 90% OF MY  
RECENT GRIEVANCES. I'VE  
BEEN PUT ON GRIEVANCE  
LIMITATION 5X SINCE  
2019, 2X IN 2019 & 3X IN  
2020. I'M A TARGET  
BECAUSE OF THE CASES  
& A NO OF STAFF NOT  
INVOLVED IN THEM HAVE  
LET ME KNOW THAT  
THEY'RE AWARE OF  
THEM & MY DEFENDANTS  
ARE TELLING OTHER  
STAFF ABOUT THEM.

19 OF 21

STAFF BECAME AWARE  
WHEN THEY SHOW ME  
VIDEO FOR MY CASES.  
A NIGHTSHIFT C/O ASKED  
ME WAS I GOING TO  
SUE HIM BECAUSE I  
ASKED HIM A QUESTION  
LAST APR. I LOST 85 LBS. IN  
2 MOS IN SEG. FOR LACK  
OF FOOD & WAS DENIED  
MENTAL HEALTH CARE &  
A VISIT WITH THE DN &  
PSYCHIATRIST FOR 2 YRS  
WHILE MY MH DETERIORA-  
TED. VDO & I GAINED DN &  
PSYCHOLOGIST DAVID NEEDS  
RECOMMENDATION TO  
REMOVE ME FROM SEG.  
& PUT ME IN AN LESS  
RESTRICTIVE UNIT IN  
2020, AND DN THEY HIRED  
TO INTERVIEW IN 2020,  
JUNE, SEE CV 447, TRENT,  
KISEK ET AL. MY COUNS-  
ELOR W. KEGLEY REFUSES

20 OF 21

TO COPY CERTAIN DOCS. FOR  
MY CASES & IVE HAD TO  
GET COUNSELORS FROM  
OTHER BLDGS. TO MAKE MY  
COPIES & HEW SUPERVISOR  
L. COLLINS ALLOWS THIS,  
KEGLEY, CV 562. DEFEN-  
DANTS B. TAYLOR, SGT &  
L. COLLINS ALLOW THEIR  
OFFCS. TO DENY ME WEE &  
SHOWER, ILIOSIC & PHONE  
& BECAUSE OF MY CASES  
STAFF HAVE LABELED ME  
A SNITCH & TELL INMATES  
NOT TO TALK TO ME. STAFF  
HAVE TOLD INMATES TO  
DO BODILY HARM TO ME  
& MY UNIT MANAGER L.  
COLLINS TOLD INMATES TO  
MAKE FALSE STMTS. ON  
ME ACCORDING TO THOSE  
INMATES & AN AFF FROM  
ONE OF THEM.

I'VE EXHAUSTED  
MY REMEDIES & I STATE

21 OF 21

UNDER PENALTY OF PER-  
JURY THAT WHAT I STATE  
IS TRUE. I'M ALSO PLAINTIFF  
IN THOMPE V VDOC

Steve Hulsech

STEVE KIDD 121 1196988 2421

KED UNION STATE PRISON

BOX 1908

POUND VA 24279 \$1.76

3,702 618

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